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July 2, 2001

**BY HAND**

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**RE:** *WorldCom, Cox, and AT&T v. Verizon*  
CC Docket Nos. 00-218, 00-249, and 00-251

Dear Ms. Salas:

Enclosed for filing please find 3 public versions of Verizon Virginia Inc.'s ("Verizon VA") cost studies and the supporting materials associated with the Unbundled Network Element ("UNE") rates, both recurring and non-recurring, proposed by Verizon VA in the above-referenced arbitration proceedings. The non-public version of the studies and supporting material contain significant proprietary material, which has been redacted from the public versions. Verizon VA is also serving 1 public version, 7 non-public versions, and 3 electronic copies (3 disks per set) of the proprietary version of the enclosed materials on Commission staff.

The materials Verizon VA is providing today should provide the Commission with the information necessary to begin the process of understanding and evaluating the studies and their methodologies. The recurring cost studies, for example, begin at Part A and provide a description of the service or facilities at issue, a basic summary of the methodology used, and the cost results. Part A itself is a master summary of all the recurring costs. As these materials explain, the recurring cost studies begin with the material investments associated with each UNE, and then apply various factors to account for the various other related costs. The studies adopt a bottom-up approach and account for all the costs involved in providing each UNE to the CLECs.

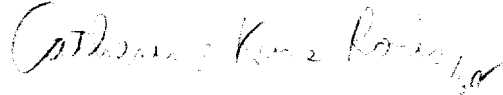
Part G contains supporting materials for the various factors Verizon VA applied to calculate the proposed costs.

The non-recurring cost studies can be found at Part H. Part H, Section A contains a description of the methodology used for the non-recurring cost model. Section I contains a summary of Verizon VA's non-recurring costs. In short, the non-recurring cost model is designed to measure the costs of the numerous activities identified as necessary to fulfill CLEC requests for UNEs and related services and products. Verizon conducted surveys to estimate the time involved in those activities, made forward looking adjustments to those estimates, and then multiplied those estimates by the relevant labor rates, which were levelized over the study planning period. The resulting costs were adjusted to account for common overhead and gross revenue loading.

In addition to the studies, results, and back-up material described above that Verizon is filing today, on July 19, 2001, Verizon VA will file its direct testimony in support of its cost studies. The testimony will explain in detail the methodology for each of the studies, as well as the key assumptions, inputs and rationale used in constructing the studies.

Please call Scott Randolph (202-515-2530) or me if you have any questions.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Catherine Kane Ronis".

Catherine Kane Ronis  
Attorney for Verizon Virginia Inc.

cc: Dorothy Atwood (7 proprietary copies, 1 public copy, and 3 electronic copies)  
Mark A. Keffer (2 proprietary copies, 1 public copy, and 2 electronic copies)  
Jodie L. Kelley (2 proprietary copies, 1 public copy, and 2 electronic copies)  
J.G. Harrington (w/o enclosures)  
Scott Randolph (w/o enclosures)  
Lydia R. Pulley (w/o enclosures)

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
Petition of WorldCom, Inc. Pursuant	)	
to Section 252(e)(5) of the	)	
Communications Act for Expedited	)	
Preemption of the Jurisdiction of the	)	CC Docket No. 00-218
Virginia State Corporation Commission	)	
Regarding Interconnection Disputes	)	
with Verizon Virginia Inc., and for	)	
Expedited Arbitration	)	
	)	
In the Matter of	)	
Petition of Cox Virginia Telecom, Inc.	)	
Pursuant to Section 252(e)(5) of the	)	
Communications Act for Preemption	)	CC Docket No. 00-249
of the Jurisdiction of the Virginia State	)	
Corporation Commission Regarding	)	
Interconnection Disputes with Verizon	)	
Virginia Inc. and for Arbitration	)	
	)	
In the Matter of	)	
Petition of AT&T Communications of	)	
Virginia Inc., Pursuant to Section 252(e)(5)	)	CC Docket No. 00-251
of the Communications Act for Preemption	)	
of the Jurisdiction of the Virginia	)	
Corporation Commission Regarding	)	
Interconnection Disputes With Verizon	)	
Virginia Inc.	)	

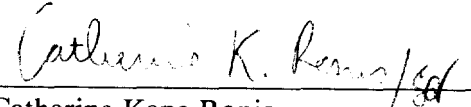
**VERIZON VIRGINIA INC.'S  
TELRIC COST STUDIES**

**CERTIFICATE OF SERVICE**

I do hereby certify that true and accurate copies of the foregoing, Verizon Virginia Inc.'s TELRIC Cost Studies, Volumes 1-16, were delivered this 2<sup>nd</sup> day of July, 2001, by hand delivery to:

Mark A. Keffer  
AT&T  
3033 Chain Bridge Road  
Oakton, VA 22185

Jodie L. Kelley  
Jenner & Block, LLC  
601 13th Street, NW  
Washington, DC 20005

  
Catherine Kane Ronis

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This page has been substituted for one of the following:

- o An oversize page or document (such as a map) which was too large to be scanned into the ECFS system.
- o Microfilm, microform, certain photographs or videotape.
- o Other materials which, for one reason or another, could not be scanned into the ECFS system.

The actual document, page(s) or materials may be reviewed by contacting an Information Technician at the FCC Reference Information Center, at 445 12<sup>th</sup> Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician.

Verizon Virginia, Inc. Telric Cost Studies

Vol I Part A Summary of Cost

Part B Unbundled Loop Study –Common Inputs

Part B-1 Two Wire Basic Unbundled Loop Density Cell 1

Vol II Part B-2 Unbundled Loop Study –Four Wire Customer Specified Signaling

Part B-3 Unbundled Loop Study –Two Wire Customer Specified Signaling

Part B-4 Unbundled Loop Study –Two Wire Basic Rate ISDN

Vol III Part B-5 Unbundled Loop Study –Four Wire Digital Data Services  
(56 or 64 kbps)

Part B-6 Unbundled Loop Study –Four Wire Digital DS1 (1.54 Mbps)

Part B-7 Customer Loop (CAR) DS3

High Capacity Access Model Cost Study

Vol IV Part B-8 Unbundled Subloop Arrangement (USLA) and Unbundled Feeder  
Subloop Element (UFSE)

Part B-9 Sub Loop Feeder DS3

High Capacity Access Model Cost Study

Part 11 Network Interface Device (NID) Cost Study

Vol V Part C-1 Unbundled Switch Ports and Features Cost Study

Part C-2 Simplified Message Desk Interface With features

Part C-3 Unbundled Switched DS1 Port Cost Study

Part C-4 Unbundled IDLC Port cost Study  
 Part C-5 Unbundled End Office Dedicated Trunk Port cost Study  
 Part C-6 Unbundled Tandem End Office Dedicated Trunk Port  
 Cost Study

Vol VI            Back-Up File For Parts: C-8 & C-10  
                     Unbundled Switching –Per MOU  
                     Unbundled Tandem Switching  
                     Unbundled Common Trunk Ports  
                     Unbundled Reciprocal Compensation  
 Part C-7 Tops Trunk Port cost Study  
 Part C-8 Unbundled Switching-Per MOU  
                     Unbundled Tandem Switching  
                     Unbundled Common Trunk Ports  
 Part C8-1 Busy Hour To Annual Ratio Back-UP  
 Part C9   Common Transport  
 Part C10   Unbundled Reciprocal Compensation

Vol VII Part D-1 Entrance Facility (HSAR) DS3, STS1, OC3 and OC12  
             Part D-2 IOF Transport cost Study  
             Part E-1 STP Port Termination UNE Cost Study  
             Part E-2 SS7/Ain-ISCP 800 Data Base Cost Study  
             Part E-3 Line Identification Database (LIDB)

Vol VIII Part F-1 Dark Fiber Cost Study  
             Part F-2 CLEC Customized Routing Service VA FCC  
             Part F-3 Daily Usage File (DUF) Cost Study  
             Part F-4 AIN Service Creation Cost Study  
             Part F-5 Access to OSS Cost Study  
             Part F-6 VA Resale Study

Vol IX Wholesale NRC Model UNE/Service List  
 Exhibit Part H  
 Section B    Functional Organization Descriptions  
 Section C    Functional Organizations Descriptions  
 Section D    Activity Description  
 Section E    Wholesale NRC Model/Levelled Labor Rates  
 Section F    Verizon NRC Model/ Input Factors  
 Section A    NRC Model for UNE/Description of NRCM Methodology  
 Section G    Wholesale NRC Model/Two Wire New Initial  
 Section H    Wholesale NRC Model/ Filing Cost Summary  
 Section I    Wholesale Rate Structure & Cost Summary / FCC UNE. Arb.  
                     Hearing  
 Section J    Service Costs  
 Section K    Work-Time Survey For UNE and Related Services  
 Section M    NR Work Activities Survey

- Section L      NR UNE Cost Study/ Panel Instructions  
NR Cost Studies
- Vol X    Part G      Factors  
Part G-1      Avoided Cost Study
- Vol XI    VA Switch Discount Support  
VA Switch Mix Support Data  
VA Vendor Support Files ( IOF, Dark, Fiber Entrance Facility)
- Vol XII    Wholesale Common Overhead Expense Loading 2000  
Part G-3 GRL Factor Study  
Part G-4 Investment Loadings Studies  
Part G-5 Marketing Factor Study  
Part G-6 Property & Other Tax Factor Study  
Part G-7 Network Factors Study  
Part G-8 Other Support Factor Study  
Part G-9 RTU Factor Study  
Part G10 Vcost Capital & Operating Expense Development
- Vol XIII    Non-Recurring Cost Model (Cont't)  
Backup to Non-Recurring Model
- Vol XIV    Backup to Non-Recurring Model
- Vol XV    Model User Manuals Support and Instruction  
CCSCIS Installations Instruction  
CCSCIS User Guide  
SCIS Installation Instructions  
SCIS/MO User Guide  
SCIS/IN User Guide
- Vol XVI    Tab 1 Obtaining personal Oracle for Vcost & LCAM  
Tab 2 Personal Oracle Installation Instruction  
Tab 3 Vcost Installation Instructions for Window 95/98/NT4.0  
Tab 4 Vcost Re-Installing and Uninstalling Instruction  
Tab 5 LCAM ODBC Setup Instructions  
Tab 6 LCAM Cleanse Procedure User Manual  
Tab 7 LCAM V1.5.5 Documentation User Manual & Overviews  
Tab 8 LCAM Operational Documentation  
Tab 9 Vcost User Documentation- Product Cost Development  
Tab 10 Vcost User Documentation- Data Table Utility